

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Grant A. Kling, Special Agent (SA) with the Federal Bureau of Investigation (FBI),

Being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the FBI and have been since September 2021. I am assigned to the Cleveland Division of the FBI at the Mansfield Resident Agency (RA). While employed by the FBI, I have investigated, among other things, federal criminal violations related to high technology, child exploitation, and child pornography. Prior to becoming a sworn Law Enforcement Agent for the FBI, I was a Staff Operations Specialist for the FBI in St. Louis, Missouri. In this role I, assisted as an analyst in the investigation of cyber related crimes, crimes against children, and violent crimes. I have attended FBI online undercover training as well as cyber specific courses related to basic networking, cyber security, and operating system defense. I have received training particular to social media and open source from both the FBI and outside agencies such as the SANS Institute; I have been an open-source trainer for the FBI since 2015. I have personally observed and reviewed examples of child pornography (as defined in 18 U.S.C. § 2256) in computer media. I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252, and 2252A, and I am authorized by law to request an arrest warrant..

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. I am investigating activities of NATHANIEL STAPLETON (hereafter STAPLETON) who utilized numerous online monikers and admitted to distributing and accessing sexually explicit images of minors and videos of child pornography. As will be shown

below, there is probable cause to believe that STAPLETON distributed visual depictions of real minors engaged in sexually explicit conduct, in violation of 18 U.S.C. § 2252(a)(1) and (b)(1), as well as 18 U.S.C. § 2252(a)(2). I am submitting this affidavit in support of an arrest warrant authorizing the arrest of STAPLETON.

4. The statements in this affidavit are based in part on information provided by the National Center for Missing & Exploited Children (NCMEC), statements made by other law enforcement officers, and my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to show STAPLETON engaged in conduct of violation 18 U.S.C. § 2252(a)(2).

STATUTORY AUTHORITY

5. This investigation concerns alleged violations of 18 U.S.C. § 2252(a)(1) and (b)(1), and 18 U.S.C. § 2252(a)(2), relating to material involving the sexual exploitation of minors.

- 18 U.S.C. § 2252(a)(1) and (b)(1) prohibit any person from knowingly transporting or shipping, or attempting or conspiring to transport or ship, any visual depiction using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce, by any means, including by computer or mail, if the production of such visual depiction involved the use

of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

- 18 U.S.C. § 2252(a)(2) and (b)(1) prohibit any person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any visual depiction using any means or facility of interstate or foreign commerce, or that has been mailed or shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproducing any visual depiction for distribution using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce or through the mails, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

6. Twitter Inc. and Snapchat Inc. are internet-based messaging and social-media applications for smartphones, tablets, and computers. Both applications are free; signing up requires an email and phone number and the generation of a unique vanity name, otherwise known as screen name. Both applications allow users to post messages, videos, and photographs publicly and privately among other features. As well both application allow users to share, post, or otherwise disseminate web links, including links to online clout storage accounts. Snapchat has the ability for self-destructing messages with a variable timer being assigned by the sender.

Information about Mega

7. Mega is a cloud-based digital storage and file-hosting website and application based outside the United States. An individual can access Mega through a web browser or through an app installed on a compatible mobile device. Users can upload electronic files and data to Mega for the purpose of storing and/or “backing-up” their data, including image and video files. A Mega user can organize data into file folders within the user’s account.

Investigation of Nathan Stapleton

8. On or about December 2020 through March of 2022, the National Center for Missing and Exploited Children (NCMEC) CyberTipline received approximately twenty-five reports relative to an individual who appeared to be sending, receiving, and selling Child Sexual Abuse Materials (CSAM) online to other profiles. The accounts were opened using a variety of social media providers including, but not limited to, Twitter/Vine, Snapchat, Yubo, and Instagram. The accounts were flagged by the service providers and shut down because of suspected CSAM materials.

9. On or about December 05, 2021 NCMEC received a CyberTipline report 109899294 from Snapchat Inc. with information that Snapchat username ‘summurz’ had sent suspected CSAM material. Snapchat provided the suspected CSAM material filename ‘summurz-None-8d008119-5af9-5527-97e1-41d6f1eac0ff~177- 786fa3deb5.mp4.’ Affiant reviewed the video; the video depicted a prepubescent girl performing oral sex on an erect, male penis. The video length was approximately one minute and twenty-three seconds. Snapchat provided IP address 98.157.233.218 as the associated IP for username ‘summurz.’

10. On or about January 07, 2022 NCMEC received a CyberTipline report 114994782 from Snapchat Inc. with information that Snapchat username ‘n8te_stapleton’ had sent suspected

CSAM material filename 'n8te_stapleton-None-5acab10c-d85b-54cb-8e16-a6a8ae359ee5~56-664c75516b.mp4.' Affiant reviewed the attached video which depicted a prepubescent girl performing oral sex on an erect, male penis. The video length was approximately forty-four seconds long. Snapchat provided an IP address of 98.157.233.218 associated to the account 'n8te_stapleton.' Additionally, the Snapchat profile 'n8te_stapleton' provided a date of birth (DOB) of November XX, 2002 [REDACTED] as well as email natestap185@gmail.com, and phone number 419-295-3284.

11. Pursuant to an administrative subpoena sent to Charter for IP address by Cuyahoga County on February 07, 2022 related to IP address 98.157.233.218, Charter responded with the following registrant information:

- IP 98.157.233.218,
- Name: Jeremy Stapleton
- Address: XXX Ramsey Dr., Mansfield, Ohio 44905 [REDACTED]

12. On or about February 6, 2022, NCMEC received a CyberTipline report 117435326 from Twitter Inc. related to suspected CSAM materials associated to Twitter vanity 'Megatra41400097, user identification (ID) number 1489802158472105988. Twitter provided the following information associated with Twitter vanity Megatra41400097: Full Name: 'Mega trade', Description: 'message me to trade mega links I'll match what you send.' Additionally, Twitter provided a captioned Tweet made by Twitter Vanity 'Megatra41400097' Text: 'Serious trader dm me to trade megas I'll match whatever you send only reply in links #megalink #megalinks #telegram #s2r...' Twitter provided information related to the account including, but not limited to, direct messages with vanity Megatra41400097. Twitter provided a Login IP address of 98.157.233.218 on February 5, 2022; the same IP address associated to NCMEC reports 109899294, and 114994782 listed above. On approximately February 6, 2022 Twitter

vanity Megatra4100097 received a message from Twitter user ID 1483491913466404865 with the following text: 'https://t.co/Qm9ZTO7wSV,' the URL expanded to 'https://mega.nz/folder/zws2WZQT#8pd8K2zr8dgij2cpbN-aiQ.' On April 18, 2022 affiant accessed the above Mega link and downloaded the contents of the link; the link contained CSAM material the title of the collection was 'INDO PEDO 08.' One video titled 'LINE_MOVIE_1573669356848.mp4' was reviewed by the affiant, the video depicted a prepubescent female with no clothing on displaying her vagina to the camera, the unidentified female changes positions throughout the video, bringing her hands near or on her vagina while looking at the camera. The video is two minutes, twelve seconds long.

13. On March 24, 2022 the Federal Bureau of Investigation (FBI) Mansfield Resident Agency (RA) executed a search warrant at XXX Ramsey Drive, Mansfield, Ohio 44905 [REDACTED]. During the execution of the warrant, STAPLETON was interviewed by the affiant and Detective Giovanni Massi of the Richland County Sheriff Department. STAPLETON provided his DOB as November XX, 2022 [REDACTED], the same as provided to Snapchat for profile 'n8te_stapleton' in NCMEC report 114994782. During the interview STAPLETON admitted to receiving links on Twitter that contained CSAM material. During the interview STAPLETON admitted to using the following monikers online: email account natestap185@gmail.com, and Snapchat vanity name 'summrz' <sic>. The email provided by STAPLETON matched the same email provided from NCMEC report 114994782, Snapchat Inc. provided information for Snapchat vanity 'n8te_stapleton' which had sent CSAM materials.

14. On March 28, 2022 STAPLETON was interviewed by FBI Agents at the Richland County Jail. During the interview STAPLETON admitted to using the following Snapchat vanity names: 'summurz,' and 'n8te_stapleton.' Both accounts were submitted to

NCMEC by Snapchat for potential CSAM materials and had contained one video each, both reviewed by the affiant as CSAM.

CONCLUSION

15. Based on the above information, there is probable cause to believe that NATHANIEL STAPLETON violated 18 U.S.C. §§ 2252(a)(1) and (b)(1), as well as 18 U.S.C. §§ 2252(a)(2) and (b)(1) which prohibits knowingly transporting, receiving or distributing or attempting or conspiring to transport, receive or distribute any visual depictions of real minors engaged in sexually explicit conduct. Accordingly, I respectfully request that this Court issue an arrest warrant for NATHANIEL STAPLETON, with a birth year of 2002 and a social security account number ending in 0796.



Grant Kling
Special Agent
Federal Bureau of Investigation

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker
United States Magistrate Judge
4:01 PM, Apr 19, 2022